

1 THE HONORABLE RICARDO S. MARTINEZ
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8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

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12 SECTRA COMMUNICATIONS AB,
13 Plaintiff,
14 v.
15 ABSOLUTE SOFTWARE, INC. and
NETMOTION SOFTWARE, INC.,
16 Defendants.

Case No. 2:22-cv-0353-RSM

**STIPULATION AND ORDER
EXTENDING DEFENDANT
NETMOTION SOFTWARE, INC.'S
NOTING DATE ON ITS MOTION FOR
LEAVE TO AMEND COUNTERCLAIM**

**NOTE ON MOTION CALENDAR:
SEPTEMBER 20, 2022**

The parties to the above-captioned action (the “Parties”), submit the below stipulation pursuant to Civil Local Rule 7(l) for review and approval by the Court:

WHEREAS, the Parties have engaged in good-faith meet-and-confer discussions regarding the need for jurisdictional discovery in connection with Defendant NetMotion Software Inc.’s (“NetMotion”) Motion for Leave to Amend (Dkt. No. 99) (the “Motion”); and

WHEREAS, Plaintiff Sectra Communications AB (“Sectra”) filed a declaration from Sectra, Inc. employee Tobias Englund in support of Sectra’s opposition to the Motion (Dkt. No. 102-1); and

WHEREAS, Sectra has agreed to make its declarant Tobias Englund available for deposition; and

WHEREAS, to allow time for the deposition of Mr. Tobias Englund, the Parties agree that the Noting Date on NetMotion's Motion should be extended to October 14, 2022, such that NetMotion's reply in support of the Motion would be filed on or before October 14, 2022.¹

THEREFORE, the Parties hereby **STIPULATE** that the noting date on Defendant NetMotion Software Inc.'s motion for leave to amend be extended to October 14, 2022.

SO STIPULATED.

DATED this 20th day of September, 2022

Respectfully submitted,

COOLEY LLP

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¹ NetMotion also intends to file a motion for jurisdictional written discovery. Sectra opposes any such motion for jurisdictional written discovery.

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12 *SOFTWARE, INC.,*

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27 *Attorneys for Plaintiff*
28 *SECTRA COMMUNICATIONS AB*

1 IT IS SO ORDERED.
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4 DATED this 22nd day of September, 2022.
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10 RICARDO S. MARTINEZ
11 UNITED STATES DISTRICT JUDGE
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